

Objection Date and Time: October 23, 2009 at 4:00 p.m. (Prevailing Eastern Time)
Hearing Date and Time: October 28, 2009 at 10:00 a.m. (Prevailing Eastern Time)

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Related Services Company, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

)
) Chapter 11 Case No.
)
)
) 08-13555 (JMP)
)
) (Jointly Administered)
)

**NOTICE OF MOTION PURSUANT TO BANKRUPTCY RULE 9019(b) FOR
APPROVAL OF SETTLEMENT AGREEMENT BETWEEN BARCLAYS CAPITAL
INC. AND AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.**

PLEASE TAKE NOTICE that a hearing on the annexed motion, dated as of
October 5, 2009 (the "Motion"), of American Express Travel Related Services Company, Inc.
(the "American Express"), pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure
for approval of settlement agreement between Barclays Capital Inc. and American Express,
will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the
United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One
Bowling Green, New York, New York 10004 (the "Bankruptcy Court"), on **October 28, 2009 at
10:00 a.m. (Prevailing Eastern Time)** (the "Hearing").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Shai Y. Waisman, Esq., attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq.; (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq., and Quinn Emanuel Urquhart Oliver & Hedges, LLP, 51 Madison Ave, 22nd Floor, New York, NY 10010 Attn: Eric M. Kay, attorneys for the official committee of unsecured creditors appointed in these cases; and (v) Crowell & Moring LLP, 590 Madison Avenue, New York, New York 10022, Attn: Steven B. Eichel, Esq., attorneys for American Express, so as to be so filed and received no later than **October 23, 2009 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is

not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: October 5, 2009
New York, New York

/s/ William M. O'Connor
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